

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

VS.

CASE NO. 3:13-CR-295-K

KEILON VIDAL SANDERS (18)

DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW, Keilon Vidal Sanders, Defendant, by and through his attorney of record, and would respectfully show unto the Court as follows:

1. This matter has been set for Sentencing on August 20, 2014,.
2. There have been delays in arranging the presentence interview as counsel for Mr. Sanders is free only on Fridays during a death penalty jury selection. When counsel arrived at the FCI Ft. Worth facility for the first interview she was turned away as the prison was on lockdown due to a perimeter breach. The interview was rescheduled for this past Friday, when counsel was again turned away for reasons that are not clear.

The USPO Melissa Faraci was able to conduct only a partial interview before the teleconference was disconnected. Counsel will endeavor to fill in the gaps this week but through no fault of the USPO the PSR cannot be prepared in time under the existing scheduling order.

3. Counsel requests this Sentencing date be continued, and the other deadlines other deadlines established by the Court's orders be likewise extended.
4. This motion is not made for the purposes of delay, but so that justice may be served.

WHEREFORE, PREMISES CONSIDERED, Defendant, through counsel, prays that the Court enter an order rescheduling the time for pretrial hearing and trial scheduling, and for such other and further relief to which he may be entitled.

\s\ Brook A. Busbee
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CERTIFICATE OF CONFERENCE

On April 25, 2014, the undersigned conferred with Suzanna Etessam, Assistant United States Attorney. Ms. Etessam does not oppose this motion.

s/ Brook A. Busbee
Brook A. Busbee

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was delivered to the United States Attorney (AUSA Suzanna Etessam) by the undersigned by email on the date of its filing.

\s\ Brook A. Busbee
Brook A. Busbee